

1 RICHARD J. DOREN, SBN 124666
rdoren@gibsondunn.com
2 HEATHER L. RICHARDSON, SBN 246517
hrichardson@gibsondunn.com
3 GIBSON, DUNN & CRUTCHER LLP
333 South Grand Avenue
4 Los Angeles, CA 90071-3197
Telephone: 213.229.7000
5 Facsimile: 213.229.7520

6
7 Attorneys for Defendants, AETNA HEALTH, INC.
and the SAUDI ARABIAN OIL COMPANY RETIREE
8 MEDICAL PAYMENT PLAN

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11

12
13 KIMBER VON BLOHN, ELAINE VON
BLOHN, and CHRIS VON BLOHN;

14 Plaintiffs,

15 v.

16 AETNA HEALTH, INC., a Connecticut
17 corporation, and the SAUDI ARABIAN OIL
COMPANY RETIREE MEDICAL
18 PAYMENT PLAN,

19 Defendants.
20
21
22
23
24
25
26
27
28

CASE NO. 14-CV-04556-PJH

**JOINT STIPULATION OF DISMISSAL
WITH PREJUDICE PURSUANT TO
FEDERAL RULE OF CIVIL PROCEDURE
41(a)(1)(A)(ii) AND ORDER**

1 The parties to the above-captioned litigation, by and through their respective counsel of
2 record, hereby stipulate as follows:

3 WHEREAS, the parties have reached a confidential agreement to settle Plaintiffs' claims
4 against Defendants that resolves the above-captioned matter;

5 NOW, pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiffs Kimber von
6 Blohn, Elaine von Blohn, and Chris von Blohn, and Defendants Aetna Health, Inc. and Saudi Arabian
7 Oil Company Retiree Medical Payment Plan hereby jointly stipulate to the dismissal of this action,
8 with prejudice. Each party is to bear its own respective costs and attorneys' fees associated with the
9 action. The parties request that this Court retain jurisdiction for the limited purpose of enforcing the
10 Settlement Agreement made between the parties, if necessary.

11 **IT IS SO STIPULATED.**

12
13 In accordance with N.D. Cal. Local Rule 5-1, the filer of this document hereby attests that the
14 concurrence to the filing of this document has been obtained from the other signatories hereto.

15
16 Dated: January 28, 2015

17 CREITZ & SEREBIN LLP

18 KANTOR & KANTOR LLP

19
20 By: /s/ Joseph A. Creitz
Joseph A. Creitz

21 Attorneys for Plaintiffs KIMBER VON BLOHN,
22 ELAINE VON BLOHN, and CHRIS VON BLOHN

23 Dated: January 28, 2015

24 RICHARD J. DOREN
25 HEATHER L. RICHARDSON
GIBSON, DUNN & CRUTCHER LLP

26 By: /s/ Heather L. Richardson
Heather L. Richardson

27 Attorneys for Defendants, AETNA HEALTH, INC. and
28 SAUDI ARABIAN OIL COMPANY RETIREE
MEDICAL PAYMENT PLAN

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: January ²⁹, 2015

The Honorable Phyllis J. Hamilton



CERTIFICATE OF SERVICE

I, Candie Trainor, declare as follows:

I am employed in the County of Los Angeles, State of California; I am over the age of eighteen years and am not a party to this action; my business address is Gibson, Dunn & Crutcher LLP, 333 South Grand Avenue, Los Angeles, California 90071-3197, in said County and State. On January 28, 2015, I served the following document(s):

**JOINT STIPULATION OF DISMISSAL WITH PREJUDICE PURSUANT TO
FEDERAL RULE OF CIVIL PROCEDURE 41(a)(1)(A)(ii)**

- ☒ **BY CM/ECF Electronic Service:** I caused such document to be served via the Court's (NEF) electronic filing system on all registered parties.
- ☐ **BY First-Class Mail, Postage Prepaid:** I caused such document to be served via U.S. mail to the following non-CM/ECF participant(s):

I am employed in the office of **Heather Richardson**, a member of the bar of this court, and that the foregoing document(s) was (were) printed on recycled paper.

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 28, 2015.



Candie Trainor